

ATTACHMENT A  
TO  
VERIFIED STATEMENT  
OF  
JAMES ZOLNIEREK  
  
**(PUBLIC VERSION)**

TELECOMMUNICATIONS DIVISION  
ILLINOIS COMMERCE COMMISSION

DOCKET NO. 01-0466

August 10, 2001

Illinois Commerce Commission  
Data Request

Staff Data Request JZ-XO 1.1-1.2

Requested of Company Representative: Carol Pomponio

Company: XO Illinois, Inc. ("XO")

Date Submitted: 7/12/01

Reference No.: ICC Docket 01-0466

Description of Data Request:

Please provide the following documents and requested information on or before July 19, 2001 according to the following directions:

Furnish all the information requested for each item in this data request. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.

The response to each data request item should begin on a new page. As part of your response, please identify the item to which you are responding by typing it at the top of the page. In addition, provide the name, job title and phone number of the person responsible for providing the information requested for each item.

Documents and work papers provided as part of your response should be attached to the sheet containing your response. Each page of all documents and work papers provided in response to any data request item should be clearly marked with the data request item number, unless stapled together, in which case only the first page need be marked.

Please provide individual responses as they become available. If, in your responses to this staff data request, you make reference to written testimony filed by your utility's witnesses in this docket, please include page numbers and line numbers where the information sought by the staff in each question can be found. Your cooperation is greatly appreciated.

JZ-XO 1.1 – In the ISP-Bound Traffic Order<sup>1</sup>, the FCC identified ISP-bound traffic as the "...traffic exchanged between LECs that exceeds a 3:1 ratio of terminating to originating

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<sup>1</sup> Federal Communication's Commission (FCC) Order on Remand and Report and Order In the Matter of Implementation of Local Compensation Provisions in the Telecommunications Act of 1996 and Intercarrier Compensation for ISP-Bound Traffic ("FCC ISP-Bound Traffic Order"), CC Docket Nos. 96-98 and 99-68, released April 27, 2001 at paragraph 8.

traffic...” Measuring traffic according to the FCC proxy methodology please provide for Illinois, for the first quarter of 2001:

- A. The aggregate number of ISP-bound minutes originated by XO and sent by XO to Ameritech.
- B. The aggregate number of 251(b)(5) minutes originated by XO and sent by XO to Ameritech. (Exclude ISP-bound traffic reported in JZ-XO1.1.A.)
- C. The aggregate number of ISP-bound minutes originated by Ameritech and sent by Ameritech to XO.
- D. The aggregate number of 251(b)(5) minutes originated by Ameritech and sent by Ameritech to XO. (Exclude ISP-bound traffic reported in JZ-XO1.1.C.)

JZ-XO 1.2 – At paragraph 79 of the ISP-Bound Traffic Order the FCC indicates that the presumption that traffic identified by its 3:1 ratio proxy is ISP-Bound traffic is a rebuttable presumption.

- A. Does XO accept the estimates produced by the FCC proxy methodology as the measure of the number of minutes of ISP-Bound traffic sent to it by Ameritech in Illinois?
- B. If XO does not accept the estimate produced by the FCC proxy methodology as the measure of the number of minutes of ISP-Bound traffic sent to it by Ameritech in Illinois then please provide XO’s corrected number of aggregate minutes of ISP-Bound traffic sent to it by Ameritech in Illinois and all evidence necessary and sufficient to rebut the estimate presumed by the FCC proxy methodology.
- C. If XO does not accept the estimate produced by the FCC proxy methodology as the measure of the number of minutes of ISP-Bound traffic sent to it by Ameritech in Illinois then please provide XO’s corrected number of aggregate minutes of 251(b)(5) traffic sent to it by Ameritech in Illinois.

Please submit your responses by July 19, 2001 to:

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800  
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**RESPONSES CONTAIN CONFIDENTIAL INFORMATION**